REMARKS

Applicants respectfully request consideration of the subject application as amended herein. In this Amendment, no claims have been added or canceled. Claims 78-84 are amended. Therefore, claims 71-91 are presented for examination.

Objections

The current Office Action objects to claims 78-84 for using the term "computer readable medium," without proper support in the detailed description. Claims 78-84 have been amended to recite, "a storage device." Support for the term "storage device," can be found, for example, on page 8, lines 10-16 and page 9, lines 4-11. Accordingly, Applicants respectfully request that the objection be withdrawn.

Claim Rejections

Claims 71-90 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Nagamoto et al. (US 6,334,126, hereinafter "Nagamoto") in view of Tso et al. (US 6,421,733, hereinafter "Tso").

Nagamoto teaches a server that can convert image data from one format to another. (Nagamoto, col. 6, lines 3-8). In Nagamoto, the server receives a request for data from a client that includes information identifying capabilities of the client. (Nagamoto, col. 10, lines 30-34). The server then converts the data from one image format to another image format based on the identified capabilities. (Nagamoto, col. 11, lines 9-17). In Nagamoto, the image data is converted from a first image format to a second image format by decompressing the image data in the first image format, and recompressing the image data into the second image format. (Nagamoto, col. 11, lines 9-

17). However, Nagamoto does not teach that the image data is decompressed to generate a bitmap. Nagamoto could, for example, decompress image data to generate a vector image or a metafile image rather than a bitmap image. Moreover, Nagamoto does not teach converting a decompressed bitmap image to a standard intermediate format, nor mapping the standard intermediate format to a selected image format. In contrast, claim 71 recites, "decompressing the digital photographic image to generate a bitmap in a color scheme that was used to generate the digital photographic image, converting the bitmap of the digital photographic image to a standard intermediate format, and mapping the standard intermediate format of the digital photographic image to the selected image format." Therefore, Nagamoto fails to teach or suggest all of the features of independent claim 71.

The current Office Action cites Figures 7A-8, col. 10, line 59 - col. 11, line 16 and col. 14, line 46 - col. 15, line 15 of Nagamoto as teaching, "decompressing the digital photographic image to generate a bitmap in a color scheme that was used to generate the digital photographic image, converting the bitmap of the digital photographic image to a standard intermediate format, and mapping the standard intermediate format of the digital photographic image to the selected image format." Applicants respectfully disagree with the Office Action's reading of Nagamoto.

Figure 7A of Nagamoto shows a table that identifies capabilities of different terminal ID codes. Figure 8 shows another table that identifies attributes of data. Neither Figure 7A nor Figure 8 teach decompressing a digital photographic image to generate a bitmap, converting the bitmap to a standard intermediate format, or mapping the standard intermediate format to a selected image format.

Col. 10, line 59 – col. 11, line 16 of Nagamoto teaches identifying capabilities of

a terminal, identifying attributes of data, and converting the data so that the data can be presented by the terminal. Col. 14, line 46 – col. 15, line 15 of Nagamoto teaches processing image data so that it can be presented at a communication terminal. However, neither of the cited passages teach decompressing a digital photographic image to generate a bitmap, converting the bitmap to a standard intermediate format, or mapping the standard intermediate format to a selected image format. Nor are such features taught elsewhere in Nagamoto.

Tso teaches a system for dynamically transcoding data transmitted between computers. Such transcoding can include compressing or decompressing image data. (Tso, col. 12, lines 55-67). However, Tso does not teach that the image data is decompressed to generate a bitmap. Nor does Tso teach converting a decompressed bitmap image to a standard intermediate format, or mapping the standard intermediate format to a selected image format. Therefore Tso fails to teach or suggest the features of claim 71 that are missing from Nagamoto. Accordingly, Applicants respectfully submit that claim 71, and claims 72-77 which depend on it, are patentable over the combination of Nagamoto and Tso.

Claims 78 and 85 include the language, "decompressing the digital photographic image to generate a bitmap in a color scheme that was used to generate the digital photographic image, converting the bitmap of the digital photographic image to a standard intermediate format, and mapping the standard intermediate format of the digital photographic image to the selected image format." As noted above, neither Nagamoto nor Tso, alone or in combination, teach or suggest such a limitation. Accordingly, the Applicants respectfully submit that the present invention as claimed in claims 71, 78 and 85, and their corresponding dependent claims, is patentable over the cited references. Applicants thus respectfully request that the rejection under 35 U.S.C. 103(a) be withdrawn.

Conclusion

Applicants respectfully request the withdrawal of the rejections and submit that pending claims 71-91 are in condition for allowance. Applicants respectfully request reconsideration of the application and allowance of the pending claims.

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: January 8, 2009

  /Judith Szepesi/
Judith A. Szepesi
Reg. No. 39,393

1279 Oakmead Parkway
Sunnyvale, CA 94085-4040
(408) 720-8300